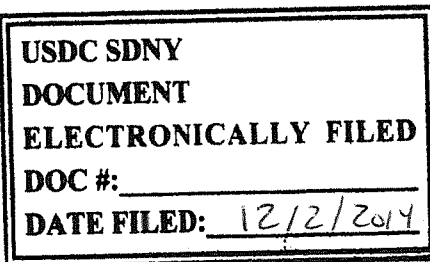


LAW OFFICES OF DAN GUS
A PROFESSIONAL CORPORATION
www.dan-gus.com



Dallas County

3102 Maple Avenue, Suite 400
Dallas, Texas 75201
(214) 960-4116 (Telephone)
(214) 960-4140 (Facsimile)

Ellis County

209 E. Main Street
Waxahachie, TX 75165
(972) 330-2775 (Telephone)
(214) 960-4140 (Facsimile)

dan@dan-gus.com
*Reply to Ellis County Office

December 1, 2014

VIA ELECTRONIC FILING

The Honorable Analisa Torres, United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: *A & G, Inc. v. Mooyeon Kim*, Case No. 14-CV-7937

Dear Judge Torres:

This letter-motion is filed pursuant to your Individual Practices I.D and II.B. The initial case management conference in the above-referenced case is scheduled for December 8, 2014 at 4:15 p.m. The Defendant's answer deadline is December 3, 2014. I was contacted by Brad Newberg of Tysons Corner, Virginia, who advised that he had been retained to represent Mr. Kim. Mr. Newberg requested my agreement to an extension of Mr. Kim's answer deadline. I agreed that my client would not seek a default judgment so long as Mr. Kim's answer was filed by December 22, 2104. Thus, Mr. Kim's counsel has not, and will not, make an appearance at least one week prior to December 8, 2014. Accordingly, I submit this letter-motion requesting an adjournment of the initial case management conference until January 2015. I further request a corresponding extension of the deadline for the parties to file the required joint letter with a proposed Case Management Plan and Scheduling Order.

I appreciate the Court's attention to this matter. Please let me know whether any additional information is required of me at this juncture.

Sincerely,

/s/ Dan Gus

Dan Gus

The Honorable Analisa Torres
December 1, 2014
Page 2 of 2

Cc: **VIA ELECTRONIC MAIL:**
Mr. Brad Newberg
McGuire Woods LLP
1750 Tysons Boulevard
Suite 1800
Tysons Corner, VA 22102-4215
BNewberg@mcguirewoods.com

GRANTED. The initial pre-trial conference is
ADJOURNED to **January 21, 2015 at 4:30**
p.m. The joint letter and case management plan
shall be submitted by **January 14, 2015**.

SO ORDERED.

Dated: December 2, 2014
New York, New York



ANALISA TORRES
United States District Judge